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By ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

May 24, 2022

MEMORANDUM ENDORSED

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. Defendants write to respectfully request a three-day extension from May 24, 2022, until May 27, 2022, to perform the review for any missed deadlines pertaining to the Discovery Chart as ordered by the Court (Dkt. Nos. 541, 546). Defendants also respectfully request a corresponding extension from June 1, 2022, to June 3, 2022, to perform the review for any misstatements pertaining to the Discovery Chart. This is defendants' first request for an extension of time to respond to the Court's Order and Memorandum Endorsement at Docket Numbers 541 and 546. With the current allegations of misstatements lodged against defendants, we are engaging in a careful review. While it should have been a simple task to review a chart for missed deadlines, additional time is needed to confirm as best we can the accuracy of the deadlines in the April 15th Discovery Chart. Defendants sought plaintiffs' position on this application at 4:45 p.m. and have not received a response.

Thank you for your consideration herein.


Respectfully submitted,

Amy Robinson s/
Amy Robinson
Senior Counsel

cc: ALL COUNSEL (via ECF)

The City surely realized that it needed a three-day extension of time before 4:45 p.m. on the date of the court-ordered deadline and thus it acted unreasonably in delaying its application. It is also unreasonable to expect an adversary to respond to any request at 4:45 p.m. on the date a response is required. In the future, the City must make an application for an extension of a Court-ordered deadline as soon as possible after it becomes aware of its need for such an extension. The Court will not in the future grant applications that do not meet this requirement. That being said, the Court will grant the extension requested in this letter.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge
May 25, 2022